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April 1, 1991

91-RF-1600

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Attn S R Grace, F R Lockhart

**IAG MILESTONE. PLAN FOR PREVENTION OF CONTAMINANT DISPERSION, EXPLANATION OF REQUEST FOR EXTENSION**

As requested by the Colorado Department of Health (CDH), EG&G is providing an explanation of the rationale behind the request for an extension of delivery of the final Plan for Prevention of Contaminant Dispersion (PPCD) from April 18, 1991 to July 22, 1991. In addition EG&G is providing a synopsis of relevant PPCD activities that have occurred in recent months.

The schedule extension, from April 18, 1991 to July 22, 1991, is necessary to implement the revised technical approach and to complete the expanded scope of work required to produce a final PPCD that will satisfy CDH and EPA requirements. This revised technical approach and expanded scope of work have been extensively discussed and agreed upon in working meetings with CDH, EPA, DOE, and EG&G. Throughout these working meetings, CDH and EPA have repeatedly stressed the need for the final PPCD to be responsive to concerns voiced by the public and for the document to be a quality instrument that will be useful throughout remediation activities at the Rocky Flats Plant (RFP). In response to CDH's request for a more complete explanation of the rationale behind this request for extension, a summary of EG&G's technical approach and revised scope of work is provided in Attachment A.

A very significant amount of work, including extensive strategy planning, has taken place since the CDH and EPA returned comments on the Draft PPCD on December 18, 1991. CDH and EPA have been closely involved. A synopsis of the work performed so far in early 1991, as well as identification of significant landmarks in the development of the current project conditions, are described in Attachment B.

**ADMIN RECORD**

REVIEWED FOR CLASSIFICATION/UCNI

By

Date

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Preliminary work has begun on revising the PPCD. Major portions of the work could not begin until after March 7, 1991 when CDH and EPA were fully briefed and concurrence was reached on the technical approach and the scope of work. Work is currently proceeding. Another working group meeting is scheduled for April 3, 1991 in which technical issues such as toxicology, dispersion modeling, and selection of indicator chemicals will be discussed.

Please contact Dennis Smith at extension 5958 if you have any questions concerning this letter or if you want us to deliver it to CDH and EPA.



J. M. Bersh, Associate General Manager  
Environmental Restoration & Waste Management  
EG&G Rocky Flats, Inc.

DMS pif

Orig. and 2 cc - R. M. Nelson, Jr

Attachments.

As Stated

## Attachment A

Attachment A-1 outlines the concept underlying the revised technical approach. This concept is essentially a demonstration and implementation plan consisting of:

- (1) An identification of soil contaminant levels that, if released to the atmosphere from remedial investigation activities, could create conditions that are unsafe to the public.
- (2) Specification of conditions and dispersion prevention requirements that must be met to conduct remedial investigation activities when soil threshold levels are not exceeded (Stage I) and when soil contaminant concentrations exceed threshold levels (Stage II).
- (3) Identification of monitoring requirements to evaluate the effectiveness of contaminant dispersion prevention techniques.

Implementation of this technical approach requires completion of a scope of work consisting of four major technical tasks. The four technical tasks are:

### Task I. Establish Soil Threshold Levels

This task entails identifying and quantifying major emission producing RFI/RI activities, evaluating contaminants of concern and appropriate exposure criteria, and performing dispersion modeling and model diagnostics.

### Task II. Preventive Measures Assessment

This task will identify contaminant dispersion control technologies and processes, and will identify the attributes that may distinguish them on a relative basis as appropriate for the major emission producing RFI/RI activities. Attributes for consideration shall include effectiveness, implementability, and cost.

### Task III. Evaluate Monitoring Requirements

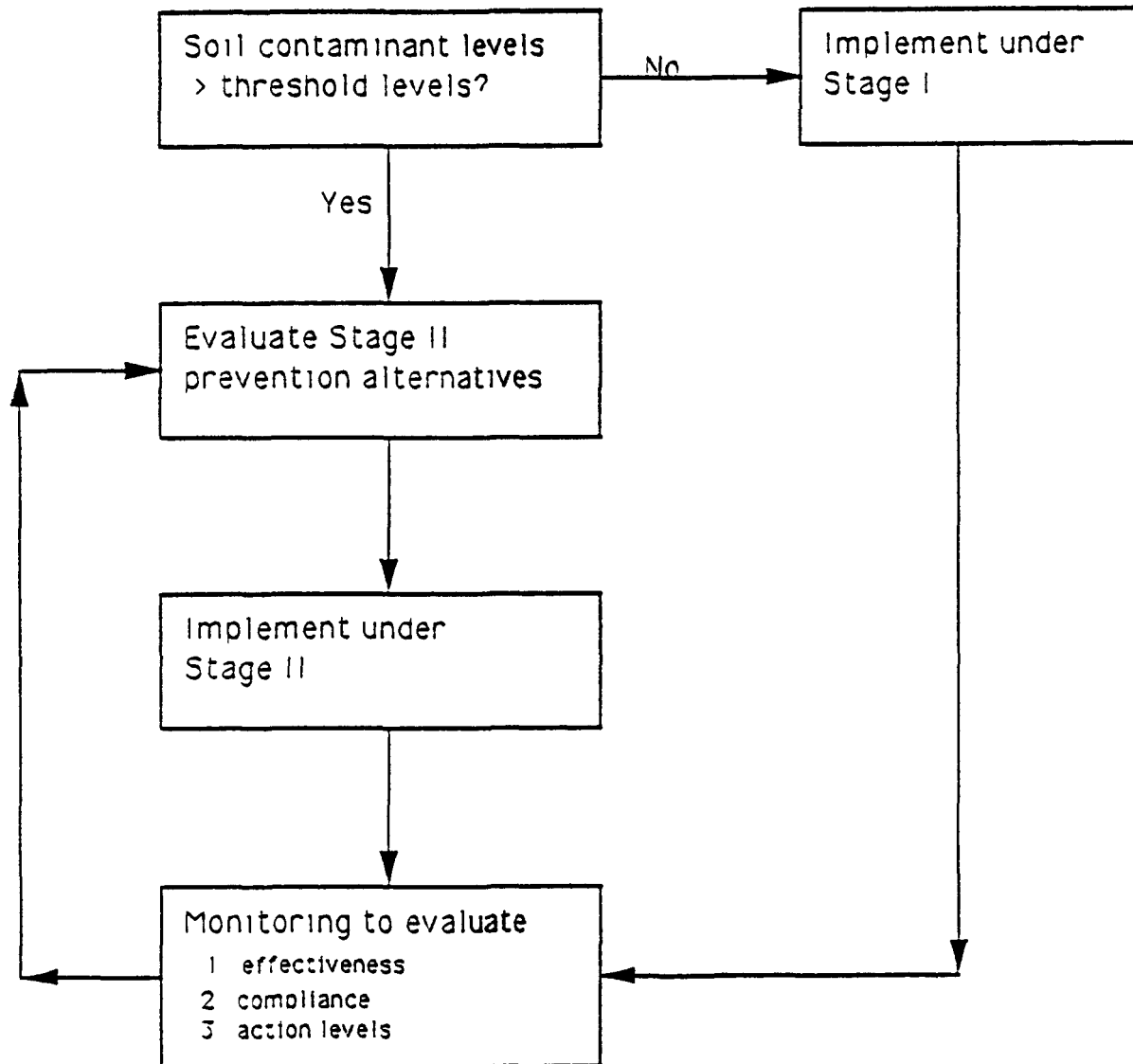
Under this task, existing monitoring programs will be evaluated relative to their applicability for monitoring the effectiveness of the specified preventive measures. If the existing monitoring programs are found to be inadequate for monitoring the effectiveness of mitigative actions, additional monitoring requirements will be evaluated.

### Task IV. Implementation Plan

A practicable implementation plan will be developed under this task. The implementation plan will address how the PPCD is to be executed under the auspices of the IAG and within the DOE/EG&G system.

A fifth task, Response to Comments, will also have to be completed before submittal of the final PPCD.

ATTACHMENT A-1  
Implementation of the PPCD  
Technical Approach



## Attachment B

### PPCD Significant Activities and Events

- 1 A meeting was held on January 31, 1991 with CDH and EPA to review comments on the Draft PPCD and to discuss their concerns. CDH and EPA comments were extensive (27 pages). At this meeting, CDH and EPA stressed that the PPCD must be responsive to public concerns. It was also acknowledged that the IAG Statement of Work (SOW) was vague and did not adequately convey their (CDH and EPA) requirements for the PPCD.
2. On February 7, 1991, another meeting was held with CDH and EPA in which DOE and EG&G outlined a revised technical approach and extensively expanded Scope of Work. A revised schedule for submitting a Final PPCD (late July 1991) was discussed and generally agreed upon. The revised approach and Scope of Work were developed in response to CDH and EPA comments. EPA and CDH both acknowledged the revised approach and Scope of Work as appropriate.
- 3 On February 8, 1991, DOE notified CDH and EPA of DOE's intention to issue an Interim PPCD by February 22, 1991 (the IAG milestone date) and asked for a schedule extension until April 18, 1991 to submit the Final PPCD. Unfortunately, DOE and EG&G staff did not convey that alignment on the approach, scope, and schedule had been achieved at the staff level before this letter was sent.
- 4 On February 21, 1991, DOE submitted an Interim PPCD and requested a schedule extension to July 22, 1991 to implement the revised technical approach and expanded Scope of Work.
5. On February 28, 1991, CDH granted DOE's request to submit the Interim PPCD as a work modification. In the same letter, CDH also granted DOE's request to submit the final PPCD on April 18, 1991.
- 6 On March 7, 1991, the PPCD working group met and went over the Interim PPCD. CDH found the document to be generally satisfactory with only minor clarification required. The proposed July 22, 1991 schedule extension was reviewed and agreed upon. The issue of schedule was closed with DOE promising to prepare a letter detailing the scope of work thereby justifying the schedule extension.
- 7 In a letter dated March 7, 1991, CDH formally requested a more complete explanation of the rationale behind DOE's request for an extension of the schedule to July 22, 1991 for delivery of the final PPCD.